

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Criminal No.: 19-10063-DJC
)	
RANDALL CRATER,)	
)	
Defendant.)	

JOINT MOTION FOR EXCLUSION OF TIME UNDER THE SPEEDY TRIAL ACT

The United States of America and the defendant jointly move the Court to exclude the time period from January 6, 2020, through and including March 4, 2020, from the speedy trial clock, pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), on the ground that the ends of justice served by excluding this period outweigh the public and defendant's interest in a speedy trial.

In support, the Parties state that on January 6, 2020, a Final Status Conference occurred during which the parties requested the case be sent up to the District Court for an Initial Pretrial Conference. During this hearing, counsel for the defendant requested that any pretrial conference not take place prior to March 1, 2020, and agreed that the time period between the Final Status Conference and the Initial Pretrial Conference should be excluded under the Speedy Trial Act.

The time period between January 6, 2020 through and including March 4, 2020 will allow defense counsel the opportunity to continue his review discovery in the case and meet with his client to determine how to proceed. Thus, this period constitutes "the reasonable time necessary for effective preparation, taking into account the exercise of due diligence," and the ends of justice served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial pursuant to the Speedy Trial Act, Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(A).

Respectfully submitted,

ANDREW E. LELLING
UNITED STATES ATTORNEY

Date: January 22, 2020

By: /s/ Jordi de Llano
Jordi de Llano
Assistant U.S. Attorney

/s/ Caitlin R. Cottingham
Caitlin R. Cottingham
Trial Attorney

Date: January 22, 2020

By: /s/ Ray E. Chandler
Ray E. Chandler
Counsel for Randall Crater

CERTIFICATE OF SERVICE

I, Jordi de Llano, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

Date: January 22, 2020

/s/ Jordi de Llano
Assistant United States Attorney